

PRYOR & MANDELUP, L.L.P.
Attorneys for Robert L. Pryor, Esq., Trustee
A. Scott Mandelup, Esq.
675 Old Country Road
Westbury, New York 11590
(516) 997-0999
asm@prvormandelup.com

HEARING DATE: October 7, 2021
HEARING TIME: 10:00 a.m.
OBJECTION DATE: September 30, 2021
OBJECTION TIME: 4:00 p.m.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re:

NEDRA K. AMBROSE,
AKA NEDRA K. BELLE,
Debtor.

Case No. 8-19-71407-las

Chapter 7

NOTICE OF MOTION

-----X
PLEASE TAKE NOTICE, that upon the Application, dated September 17, 2021, submitted by Robert L. Pryor (“Trustee”), as Chapter 7 trustee of the bankruptcy estate (“Estate”) of Nedra K. Ambrose (“Debtor”), by his attorney Pryor & Mandelup, L.L.P., in support of his motion (“Motion”) seeking the so ordering, or entry of an order approving, the annexed Stipulation and Order, dated as of September 17, 2021, between the Trustee and Bank of America (“BOA”), a secured creditor of Debtor as holder of two mortgages against the real property located at 497 E. 94th Street, Brooklyn, NY 11212 (the “Property”), co-owned by Debtor and her four children, providing for a carveout for the benefit of the Estate from the proceeds of the sale of the Property, which proceeds would otherwise be payable to BOA in consideration of its first priority mortgage against the Property, a hearing (“Hearing”) on the Motion will be held before the Hon. Louis A. Scarcella, United States Bankruptcy Judge, at the United States Bankruptcy Court, Long Island Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722, Room 970, or as otherwise directed by the Court, on October 7, 2021 at

10:00 a.m. (“Hearing Date”).

PLEASE TAKE FURTHER NOTICE, that a copy of the Application is available for inspection at the office of the Clerk at the United States Bankruptcy Court during normal business hours at the Long Island Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722.

PLEASE TAKE FURTHER NOTICE, that Objections to the Motion shall be filed as follows: (a) (i) through the Bankruptcy Courts electronic filing system (in accordance with General Order M0182), which may be accessed through the Internet at the Bankruptcy Court’s website: www.nyeb.uscourts.gov, using Netscape Navigator software version 3.0 or higher, and (ii) in portable document format (PDF) using Adobe Exchange software conversion; or (b) if a party is unable to file electronically, such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, document number of the document to which the objection refers, and file name on the outside of the envelope; or (c) if a party is unable to file electronically or use PDF format, such part shall submit the objection on a diskette in either Word, WordPerfect, or DOS text (ASCII) format. An objection filed by a party with no legal representation shall comply with section (b) or (c) as set forth in paragraph. A hard copy of the objection, whether filed pursuant to section (a), (b) or (c), as set forth in this paragraph, shall be served upon: (i) the Trustee’s counsel, Pryor & Mandelup, L.L.P., 675 Old Country Road, Westbury, New York 11590, Attn. A. Scott Mandelup, Esq.; and (ii) the Office of the United States Trustee, 560 Federal Plaza, Central Islip, NY 11722, Attn. William Birmingham, Esq., and filed with the Clerk of the Bankruptcy Court, so as to be received on or before 4:00 p.m. on September 30, 2021 (“Objection Date”).

PLEASE TAKE FURTHER NOTICE, that if no objections are received by the
Objection Date, the relief requested in the Motion may be granted at the Hearing.

Dated: Westbury, New York
September 17, 2021

PRYOR & MANDELUP, L.L.P.
Attorneys for Trustee

By: s/A. Scott Mandelup
A. Scott Mandelup
675 Old Country Road
Westbury, New York 11590
(516) 997-0999
asm@pryormandelup.com

To: Debtor
Debtor's Counsel
Counsel for co-owners of subject property
All Creditors
All Parties filing Notices of Appearance
Office of the United States Trustee